

*CC: JMS*  
**ORIGINAL**

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Attorneys for Plaintiff  
CHRISTOPHER GAHR

**UNITED STATES DISTRICT COURT,  
DISTRICT OF HAWAI'I.**

LUCAS BRUNO III, CHRISTOPHER  
GAHR, FRANK ROBERT PAULSON,  
CHARLES TURNER, TOM YOUNG,

Plaintiffs,

v.

MICHAEL CHERTOFF, Secretary,  
DEPARTMENT OF HOMELAND  
SECURITY,

Defendant.

Statement to the Jury -Bruno v. Chertoff - 1

CIVIL NO. 03-00567-JM:BMK  
STATEMENT TO THE JURY.

Trial Date: Apr. 17, 2007.

Judge: The Hon. J. Michael Seabright

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AM 3:30 PM  
APR 17 2007  
U.S. DISTRICT COURT  
CLERK'S OFFICE

APR 03 2007

at 4 o'clock and 17 PM  
SUE BEITIA, CLERK

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NOTICE IS HEREBY GIVEN that Plaintiff presents the Proposed Opening Statement to the Jury as follows:

“Ladies and gentlemen of the jury, this case was filed by the Plaintiff Christopher Gahr. He is represented by Moises A. Aviles of Aviles & Associates. He alleges that the Government of the United States by its Representative, the Honorable Michael Chertoff, Secretary of Homeland Security, violated Title VII of the Civil Rights Act of 1964 by terminating the Plaintiff as an employee of the Transportation Security Administration because of his race and age. The Government is represented by Thomas A. Helper, Assistant U. S. Attorney.

“In this case, Plaintiff will first have to prove that he was discriminated against. The Government would then have to prove that their reasons for terminating him were non-discriminatory. Finally, the Plaintiff would have to show that Government’s reasons for terminating the Plaintiff, were not the actual reasons the Government terminated him.

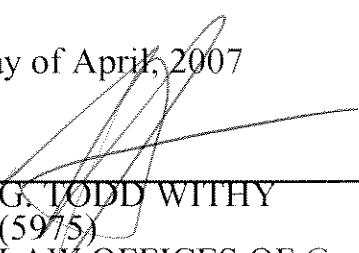
“Would the Plaintiff like to make its Opening Statement?”

Statement to the Jury -Bruno v. Chertoff - 2

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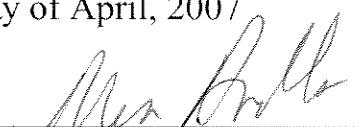
Dated this 2<sup>nd</sup> day of April, 2007

By:

  
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Dated this 2<sup>nd</sup> day of April, 2007

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Statement to the Jury -Bruno v. Chertoff - 3

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Dated this 2<sup>nd</sup> day of April, 2007

By

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Statement to the Jury -Bruno v. Chertoff - 3

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**CERTIFICATE OF SERVICE.**

I HEREBY CERTIFY that, on the date and by method of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served by First Class mail and E-mail

Thomas A Helper 5676  
Assistant U. S. Attorney  
Room 6-100 PJKK federal Building  
300 Ala Moana Blvd  
Honolulu Hawai'i 96850-6100  
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April 3, 2007 at San Bernardino, California

